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**Subject: Chlorpyrifos-methyl  
Docket ID OPP-2004-0043**

Gustafson LLC specializes in seed treatment products and holds 70% of the seed treatment market share. Gustafson LLC appreciates the opportunity to comment on this document.

Based on the July 7, 2004 Federal Register notice [OPP-2004-0043], RELDAN® 4E (active ingredient: chlorpyrifos-methyl, labeled for 6 ppm use-rate on stored grain) will be phased out by Dec. 31, 2004 (as per prior agreements between Dow AgroSciences, Gustafson, and EPA).

Originally, plans for a replacement product were focused on STORCIDE™ (RELDAN + cyfluthrin, 7501-181). However, due to the lack of international tolerances (CODEX MRLs) for cyfluthrin, STORCIDE cannot be used on grain for export. That means that unless a suitable, "export-friendly", product is registered soon, the cancellation of RELDAN 4E will leave the export grain industry without a suitable solution for stored grain protection.

Presently, Gustafson LLC has a pending submission at EPA for STORCIDE II (7501-ENE), which contains RELDAN and deltamethrin. Both of these active ingredients have CODEX MRLs. Like STORCIDE, STORCIDE II provides broad-spectrum control of stored grain insects. EPA is currently working on deltamethrin tolerances for stored grain but no definite timeline is available. If STORCIDE II obtains registration by December 2004, there will be no lapse in availability of a stored grain product that is suitable for export grain. For this reason we encourage EPA to expedite the tolerances for deltamethrin on stored grain so the STORCIDE II label can be approved as soon as possible.

Alternatively, if there is any doubt that STORCIDE II will be granted by December 2004, it is imperative that the registration of RELDAN 4E be extended until STORCIDE II is approved.

Of these two suggested options, the timely registration of STORCIDE II is preferable to the extension of registration for RELDAN 4E.

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